

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

## Caption in Compliance with D.N.J. LBR 9004-1(b)

WHITE AND CO ATTORNEYS AND  
COUNSELLORS LLC  
523 PARK AVENUE, SUITE 3,  
ORANGE, NEW JERSEY 07050  
973.669.0857 / 888.481.1709 telefax  
email to: [avram.randr@gmail.com](mailto:avram.randr@gmail.com)  
AVRAM D. WHITE ESQ. (aw5020)  
Debtor's Counsel

In Re:

JUAN CARLOS JIMENEZ,  
DEBTOR.

Case No.: 23-11272-JKS  
Judge: JOHN K. SHERWOOD  
Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (**choose one**):

1.  Motion for Relief from the Automatic Stay filed by \_\_\_\_\_, creditor,

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

Certification of Default filed by Ajax Mortgage Loan Trust 2019-F,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached.

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

There were several issues with title that had to be ironed out regarding the mortgage that I am to be mortgagee of. I can now close and ask for a hearing in this manner. I expect to close the transaction prior to any hearing.

Other (**explain your answer**):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: September 21, 2023

/s/ JUAN CARLOS JIMENEZ  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.